

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

FIELDWOOD ENERGY LLC, *et al*

Debtors.<sup>1</sup>

Chapter 11

Case No. 20-33948 (MI)

(Jointly Administered)

**LIMITED OBJECTION OF RED WILLOW OFFSHORE, LLC  
AND HOUSTON ENERGY DEEPWATER VENTURES I, LLC TO THIRD PARTY  
RELEASE PROVISIONS IN DEBTORS' PLAN OF REORGANIZATION  
[Doc. No. 1284]**

Red Willow Offshore, LLC and Houston Energy Deepwater Ventures, LLC file their Limited Objection to Debtors' Fourth Amended Joint Chapter 11 Plan of Reorganization (Doc. No. 1284), and respectfully represent as follows:

1. Red Willow Offshore, LLC ("RWO" and Houston Energy Deepwater Ventures I, LLC ("HEDV") are non-operating working interest owners in OCS leases operated by Fieldwood.

2. RWO and HEDV hereby object to, and make their election to opt out of, the third party release provisions contained in Debtors' Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors (the "Plan") [Doc. No. 1284], and any further amendments or supplements thereto. The third party release provisions are impermissible

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

because Section 524(e) of the Bankruptcy Code “prohibits the discharge of debts of nondebtors.”  
*See In re Zale Corp.*, 62 F.3d 746, 756-57 (5th Cir. 1995); *In re Vitek, Inc.*, 51 F.3d 530, 538 (5th Cir. 1995).

WHEREFORE, Red Willow Offshore, LLC and Houston Energy Deepwater Ventures I, LLC respectfully pray that this Limited Objection be sustained and the third party release provisions in Debtors’ Fourth Amended Joint Chapter 11 Plan be disallowed and stricken.

Dated: June 2, 2021  
Houston, Texas

Respectfully submitted,

/s/ Barnet B. Skelton, Jr.  
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Counsel to Red Willow Offshore, LLC  
and Houston Energy Deepwater Ventures I, LLC

### **CERTIFICATE OF SERVICE**

I hereby certify that on June 2, 2021, a true and correct copy of the foregoing has been served on all counsel and parties in interest who have consented to service via this Court’s ECF filing system at the time of filing.

/s/ Barnet B. Skelton, Jr.  
Barnet B. Skelton, Jr.